

DAVID A. JOFFE, ESQ.

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April 17, 2020

VIA ECF

The Honorable Valerie E. Caproni
United States District Judge
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: Joffe v. King & Spalding LLP, No. 17-cv-3392-VEC-SDA

Dear Judge Caproni:

The undersigned is the plaintiff in the above-captioned action, proceeding pro se.

On March 17, 2020, this Court adjourned the jury trial in this case until July 20, 2020 because of the current closures in this District related to the COVID-19 outbreak. (See Doc. No. 230; Mar. 17, 2020 Tr. at 2:6-3:18) The Court also gave the undersigned leave to depose K&S-affiliated witnesses Meredith Moss and David Fine, and set the deadline for such depositions for May 15, 2020 in order to give the parties time to work around social-distancing and other public-health restrictions then in effect. (See Doc. No. 230; Mar. 17, 2020 Tr. at 6:16-19.) In light of the recent extension of these various restrictions through the date of the Court's original deadline, the undersigned writes to respectfully request a two-week extension of the period to depose Ms. Moss and Mr. Fine, until May 29, 2020.

The information required by Individual Practice 2.C of this Court's Individual Practices in Civil Cases is as follows:

1. The reason for the proposed extension of time is that, on April 16, 2020, ongoing public-health restrictions on businesses, places of public accommodation, and non-essential gatherings in New York State were extended through May 15, 2020.¹ The prior day, on April 15, 2020, analogous restrictions and closures in Washington D.C., where Ms. Moss is located, were also extended through the same May 15, 2020 date.² That date coincides with the current deadline set by this Court for deposing Ms. Moss and Mr. Fine.

¹ See State of New York, Exec. Order No. 202.18 (Apr. 16, 2020), available at https://www.governor.ny.gov/sites/governor.ny.gov/files/atoms/files/EO_202.18.pdf; see also Press Release, Office of the Governor, Amid Ongoing COVID-19 Pandemic, Governor Cuomo Announces 'NYS on PAUSE' Extended until May 15 (Apr. 16, 2020), available at <https://www.governor.ny.gov/news/amid-ongoing-covid-19-pandemic-governor-cuomo-announces-nys-pause-extended-until-may-15>.

² See Government of the District of Columbia, Mayor's Order 2020-063 (Apr. 15, 2020), available at <https://coronavirus.dc.gov/sites/default/files/dc/sites/coronavirus/publication/attachments/MayorsOrder2020.063.pdf>; see also Press Release, Office of the Mayor, Mayor Bowser Extends Public Health Emergency, Stay at Home Order, and Closure of Non-Essential Businesses Through May 15 (Apr. 15, 2020), available at <https://dc.gov/release/mayor-bowser-extends-public-health-emergency-stay-home-order-and-closure-non-essential>.

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2. The original due date for the completion of Ms. Moss's and Mr. Fine's depositions is May 15, 2020.
3. There have been no previous requests for an extension of the deadline to depose Ms. Moss and Mr. Fine.
4. Defendant consents to the instant request.
5. The proposed alternative date for the completion of Ms. Moss's and Mr. Fine's depositions is May 29, 2020.

Thank you for your consideration of the foregoing.

Respectfully submitted,

David A. Joffe

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CC (via ECF): All counsel